

**Bruce L. Campbell**, OSB No. 925377

bruce.campbell@millernash.com

**John C. Clarke**, OSB No. 153245

john.clarke@millernash.com

**MILLER NASH GRAHAM & DUNN LLP**

3400 U.S. Bancorp Tower 111 S.W. Fifth Avenue

Portland, Oregon 97204

Phone: 503.224.5858

**Christopher Knauf**, admitted *pro hac vice*

ck@drlcenter.org

**Anthony Pinggera**, admitted *pro hac vice*

acp@drlcenter.org

**DISABILITY RIGHTS LEGAL CENTER**

1541 Wilshire Boulevard, Suite 400

Los Angeles, California 90017

Phone: 213.736.1031

**Amy Robertson**, admitted *pro hac vice*

arobertson@creeclaw.org

**Timothy Fox**, admitted *pro hac vice*

tfox@creeclaw.org

**Pilar Gonzales Morales**, admitted *pro hac vice*

pgonzalez@creeclaw.org

**CIVIL RIGHTS EDUCATION AND**

**ENFORCEMENT CENTER**

1245 E. Colfax Avenue, Suite 400

Denver, Colorado 80218

Phone: 303.757.7901

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

PHILIP WOLFE, KATALINA DURDEN,  
MELISSA LEWIS, JUNIPER SIMONIS,  
individually, and DISABILITY RIGHTS  
OREGON, an Oregon nonprofit and  
advocacy corporation,

Plaintiffs,

Case No. 3:20-cv-01882-SI

DECLARATION OF JOHN CLARKE IN  
SUPPORT OF PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION

v.

CITY OF PORTLAND, a municipal  
corporation; TED WHEELER, in his official  
capacity; CHUCK LOVELL, in his official  
capacity; MULTNOMAH COUNTY, a  
political subdivision of the State; MICHAEL  
REESE, in his official capacity; TERRI  
DAVIE, in her official capacity; CHAD  
WOLF, in his individual capacity;  
ALEJANDRO MAYORKAS, in his official  
capacity; DONALD WASHINGTON, in his  
individual and official capacity; and DOES 1-  
100, individual and supervisory officers of  
local, state, and federal government,

Defendants.

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I, John Clarke, hereby declare and state as follows:

1. I am an attorney at Miller Nash Graham & Dunn LLP, and I am one of the attorneys representing plaintiffs in the above-captioned matter. I am 18 years of age or older and am otherwise competent to make this declaration. I make this declaration on personal knowledge of the matters stated in this declaration or from sources deemed reliable.

Page 2 - DECLARATION OF JOHN CLARKE IN SUPPORT OF PLAINTIFFS'  
MOTION FOR PRELIMINARY INJUNCTION

2. A true and correct copy of Portland Police Bureau's Directive 0635.10, entitled "Crowd Management/Control" is attached as Exhibit 1.

3. A true and correct copy of the declaration of Craig Dobson dated July 6, 2020, in the matter *Don't Shoot Portland v. City of Portland*, Case No. 3:20-cv-00917-HZ, U.S. District Court for the District of Oregon, is attached as Exhibit 2.

**I declare under penalty of perjury and under the laws of the United States, pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge, memory, and belief.**

EXECUTED on this 5<sup>th</sup> day of February, 2021, in Portland, Oregon.

s/ John C. Clarke  
John Clarke

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing Declaration of John Clarke in Support of Plaintiffs' Motion for Preliminary Injunction on the attorney or party listed below on the date set forth below by the method(s) indicated:

JEFFREY BOSSERT CLARK  
Acting Assistant Attorney General  
BILLY J. WILLIAMS  
United States Attorney  
JOHN V. COGHLAN  
Deputy Assistant Attorney General  
ALEXANDER K. HAAS  
Director, Federal Programs Branch  
BRIGHAM J. BOWEN  
Assistant Director, Federal Programs Branch  
MICHAEL P. CLENDENEN, DC #1660091  
Trial Attorney  
U.S. Department of Justice  
Civil Division, Federal Programs Branch  
1100 L Street, NW  
Washington, D.C. 20530  
Telephone: (202) 353-0693  
Facsimile: (202) 616-8460

- ☐ First-class mail, postage prepaid
- ☐ Facsimile, pursuant to ORCP 9 F
- ☐ Hand-delivery
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- ☒ OJD EFILING SYSTEM, if registered at the party's email address as recorded on the date of service in the eFiling system, pursuant to UTCR 21.100.
- ☐ Other

*Attorneys for Defendants Wolf and Washington in their official capacity*

ELLEN F. ROSENBLUM, OSB #753239  
Attorney General  
DREW K. BAUMCHEN, OSB #045032  
Senior Assistant Attorney General  
Department of Justice  
1162 Court Street NE  
Salem, OR 97301-4096  
Telephone: (503) 947-4700  
Facsimile: (503) 947-4791  
Email: ellen.f.rosenblum@doj.state.or.us  
Drew.Baumchen@doj.state.or.us

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- ☐ Other

*Attorneys for Defendant Terri Davie*

DANIEL SIMON, OSB #124544  
Deputy City Attorney  
LINDA LAW, OSB #943660  
Chief Deputy City Attorney  
linda.law@portlandoregon.gov  
LINH T. VU, OSB #004164  
Senior Deputy City Attorney  
linh.vu@portlandoregon.gov  
ELIZABETH C. WOODARD, OSB #075667  
Deputy City Attorney  
beth.woodard@portlandoregon.gov  
Portland City Attorney's Office  
1221 SW 4th Ave., Rm. 430  
Portland, OR 97204  
Telephone: (503) 823-4047  
Facsimile: (503) 823-3089  
Email: dan.simon@portlandoregon.gov  
linda.law@portlandoregon.gov  
linh.vu@portlandoregon.gov  
beth.woodard@portlandoregon.gov  
  
*Attorneys for City of Portland, Ted  
Wheeler and Chuck Lovell*

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- ☐ Other

GLENN GREENE  
New York State Bar No. 2674448  
Senior Trial Attorney  
DAVID G. CUTLER  
Illinois State Bar No. 6303130  
Trial Attorney  
Torts Branch, Civil Division  
Constitutional and Specialized Tort Litigation  
PO Box 7146  
Ben Franklin Station  
Washington, D.C. 20044  
Telephone: (202) 616-4143  
Facsimile: (202) 616-4314  
Email: glenn.greene@usdoj.gov

- ☐ First-class mail, postage prepaid
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- ☐ Other

*Attorneys for Defendants Wolf and  
Washington in their individual capacity*

CHRIS GILMORE, OSB #980570  
Multnomah County Attorney's Office  
501 SE Hawthorne Blvd., Ste. 500  
Portland, OR 97214  
Telephone: (503) 988-3138  
Facsimile: (503) 988-3377  
Email: chris.gilmore@multco.us

*Attorney for Multnomah County and  
Michael Reese*

- ☐ First-class mail, postage prepaid
- ☐ Facsimile, pursuant to ORCP 9 F
- ☐ Hand-delivery
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pursuant to UTCR 21.100.
- ☐ Other

DATED: February 8th, 2021.

s/ John C. Clarke  
Attorneys for Plaintiffs